

**BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20068-0001**

Postal Rate and Fee Changes, 2006

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Docket No. R2006-1

**RESPONSES OF NATIONAL NEWSPAPER ASSOCIATION WITNESS SOSNIECKI
TO INTERROGATORIES OF UNITED STATES POSTAL SERVICE
(USPS/NNA T2-1-6)**

NNA hereby provides responses to interrogatories of the United States Postal Service, USPS/NNA T2-1-6. Each interrogatory is repeated verbatim and a response follows.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I have filed the foregoing document online in accordance with the Commission's Rules of Practice.

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October 5, 2006
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USPS/NNA-T2-1. Please describe the copies of the *Vandalia Leader* that are prepared and entered as mail.

a. You indicate that a single copy of the *Vandalia Leader* averages 14 pages (NNA-T-2 at 2; what are the dimensions, shape and weight of a typical copy, including inserts, entered during the school year?

b. For the issue you select in responding to part (a), please describe how many copies were entered where, and how much postage was paid where, for that issue (entry profile and postage statement).

RESPONSE:

a. The copy of The *Vandalia Leader* that I am describing is from Sept. 27, 2006. The newspaper itself has 16 pages. Each page is 13 1/2 inches wide by 22 3/4 inches deep. In the industry, we call these "broadsheet" or "metro" pages as opposed to the smaller "tabloid" pages. The *Leader's* pages are divided into six vertical columns of news and advertising. Each column is 21 1/2 inches deep. For purposes of determining advertising percentage, each page has 126 column inches (6x 21.5). By itself (without advertising inserts), this issue weighs .1769 pound.

The newspaper is "quarterfolded" prior to distribution. That means it has one additional fold than you would find in a typical big-city newspaper. The quarterfolded paper is 6 3/4 inches wide by 11 3/8 inches deep, about the size of a piece of typing paper, except a little narrower. It is a very easy size to handle for the consumer and the mail carrier. From my experience, maybe 40 percent of the small weekly newspapers I see are quarterfolded.

This issue has three advertising inserts, two of which run every week, although their sizes may vary a little.

The Hickman's IGA insert is 8 pages, printed on newsprint. Each page is 10 3/4 inches wide by 13 1/2 inches deep. It is quarterfolded (folded once more) before insertion into the newspaper. The quarterfolded size is 10 3/4 inches wide by 6 3/4 inches deep, which fits perfectly into the quarterfolded newspaper. The insert has the equivalent of 520 column inches.

The C & R supermarket insert is 8 pages, printed on newsprint, 11 inches wide by 12 inches deep, with a 4-page wrap-around, 11 inches wide by 9 inches deep, creating a 12-page package. When quarterfolded, the size is 11 inches by 6 inches. The insert has the equivalent of 608 column inches.

The third insert is a one-time ad from the Missouri Pork Producers and the Missouri Soybean Association. It is four pages, printed on glossy paper, heavier than newsprint, each page 8 1/2-by-11. It has the equivalent of 176 column inches. This insert also was quarterfolded; the quarterfolded size is 8 1/2-by-5 1/2.

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For purposes of mailing, we inserted the two supermarket inserts into the pork producers' insert, then inserted the pork producers' insert into the quarterfold of the newspaper.

All three inserts were mailed to subscribers in our market area (see numbers in part b). The combined weight of the three inserts is .1325 pound. Thus, the total weight of the newspaper with the inserts is .3094 pound.

Normally, our advertisers do not want their inserts in the newspapers that are mailed outside our market area. However, the pork producers/soybean insert was booked for all papers, outside the market area as well as inside. The combined weight of the newspaper and the pork producers' insert is .2175, and that is the weight that appears on the postage statement for our out-of-area mailing (see part b).

b. Copies of our Sept. 27 edition were mailed as follows:

At the Curryville 63339 Post Office: 49 copies, all to Curryville addresses.

At the Farber 63345 Post Office: 62 copies, all to Farber addresses.

At the Middletown 63359 Post Office: 25 copies, all to Middletown addresses.

At the Laddonia 63352 Post Office: 104 copies, all to Laddonia addresses.

At the Rush Hill 65280 Post Office: 4 copies to Rush Hill addresses, plus 183 to other destinations in 650-652 ZIP codes, as per page 9, lines 18-24 of my testimony. (We do not have any subscribers in 653 ZIP codes.) That's 187 total copies mailed at Rush Hill.

At the Vandalia 63382 Post Office: 653 copies to Vandalia addresses plus 462 to other destinations; these 462 are the papers that go to St. Louis for sorting. Total mailing at Vandalia: 1,115.

Total mailing, all post offices: 1,542 copies.

All postage was paid in Vandalia: \$117.65 for the 1,130 copies mailed with all three advertising inserts to our market area, and \$133.38 for the 412 copies mailed with only the pork producers/soybean insert outside our market area. Total postage: \$251.03.

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USPS/NNA-T2-2. On page 4 of your testimony, you describe awards received.

- a. Since you state on page 2 that you and your wife purchased the *Vandalia Leader* three ago, were the two awards from the Missouri Press Association, and the Community Service award from NNA, awarded to you and your wife in your capacities as publishers of some other publication(s)? If so, please identify each, the period of your ownership, and each publication's approximate circulation during the period of ownership.
- b. What other publications have you and/or your wife published in the past. Please provide the same details for each as requested in part (a).

RESPONSE:

a. The two first-place awards in community service from the Missouri Press Association were received when we owned the Webster County Citizen, a small weekly newspaper in Seymour, Mo. The 1985 community-service award from the National Newspaper Association came when we owned the Humansville Star-Leader, another small weekly, in Humansville, Mo. We owned the Humansville Star-Leader, circulation about 1,700, from 1980 to 1986. We owned the Webster County Citizen, circulation about 1,900, from 1988 to 1999. (Since we bought The Vandalia Leader in 2004, the newspaper has won 27 awards from the National Newspaper Association, the International Society of Weekly Newspaper Editors, the Missouri Press Association and the Missouri Advertising Managers Association.)

b. We published and owned the Humansville, Mo., Star-Leader, circulation about 1,700, from 1980 to 1986. I was editor and general manager of the Hillsboro, Kan., Star-Journal (circulation about 3,000) from 1986 to 1988; I was not publisher and owner, though the publisher was retired and many of my responsibilities were the same as a publisher. (Helen did not work for the Hillsboro newspaper; she was working for the Wichita Eagle-Beacon.) We published and owned the Webster County Citizen, (circulation about 1,900) in Seymour, Mo., from 1988 to 1999. We became editors of The Lebanon, Mo., Daily Record, circulation about 4,500, in June 1999 and publishers from 2000 to 2003, but we were not owners. We bought The Vandalia Leader in 2003.

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USPS/NNA-T2-3. Please refer to your testimony at page 6, lines 19 – 28. Your descriptions of sacks reflect both that you no longer use them for mailing the *Vandalia Leader* (lines 22 – 23) and that you routinely pick up “extra sacks or tubs” (line 27) as needed for that day’s out-of-town mailings. Please reconcile these descriptions.

RESPONSE:

Newspapers that we mail in Vandalia and at DDU post offices for distribution in those communities are delivered to post offices in tied bundles, walk-sequenced by routes, as USPS allows. Newspapers mailed for out-of-town delivery are packed in sacks and tubs according to USPS rules. Our out-of-town, non-DDU newspapers currently are mailed in nine sacks and four tubs. All four tubs and five of the sacks are mailed at Vandalia and go to the plant at St. Louis for sorting. Four sacks are mailed at Rush Hill, Mo., (see page 9, lines 18-24 of testimony) and are sorted at Columbia, Mo.

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USPS/NNA-T2-4. Please refer to your testimony at the bottom of page 9. Why do you make two truck deliveries of each issue to the Vandalia Post Office?

RESPONSE:

The first delivery to the Vandalia Post Office is the newspapers that are delivered locally by carriers on the same day. It is a priority to get those papers to the post office as soon as possible, before the carriers leave on their routes, thus they are labeled first. The second delivery, later in the morning, is the out-of-town newspapers that go to St. Louis. They are not trucked to St. Louis until later in the day, thus there is less urgency.

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USPS/NNA-T2-5. On page 11, line 3, of your testimony, you state, "Our papers have been long-time members of NNA." Please identify each paper to which this reference applies. For any papers not already identified in your response to USPS/NNA-T2-2, please provide the information requested by part (a) of that interrogatory.

RESPONSE:

Since we purchased our first newspaper in 1980, all of the newspapers we have owned and/or managed have been NNA members: the Humansville Star-Leader, the Hillsboro Star-Journal, the Webster County Citizen, The Lebanon Daily Record and The Vandalia Leader. Circulation information is in my response to USPS/NNA-T2-2.

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USPS/NNA-T2-6. In Appendix A and various passages of your testimony, you identify service challenges faced by the *Vandalia Leader* that you have apparently worked through with postal officials (and others). Only two matters apparently occurred in the past few months; are any of these challenges still providing ongoing opportunities for improvement? If so, please describe the current situation(s).

RESPONSE:

Thank you for the opportunity to address challenges that provide ongoing opportunities for improvement. I'd like to answer this in four parts:

a. We had a serious delivery problem to some area towns with our Aug. 30 newspaper. The worst delivery was the 16 newspapers mailed to Wellsville (ZIP 63384), about 30 miles from Vandalia. Wellsville is in our market area for advertisers and partly in our school district. Because of the 24-piece rule, USPS no longer allows us to mail these in a separate sack labeled for Wellsville. Now, they go in a sack with newspapers for other towns addressed to ST. LOUIS MO 633/NEWS FLTS CR/5D/3D.

The Wellsville newspapers that we mailed Wednesday, Aug. 30 did not arrive in Wellsville until Wednesday, Sept. 6, despite me being in near-daily contact with Patricia Harris, periodicals coordinator for the USPS Gateway District in St. Louis, in an effort to track them down. When those newspapers remained missing on Tuesday, Sept. 5, we remailed them, with the permission of Patricia Harris. Even though the sack containing the remailed newspapers contained an external note in the side pocket that said: ATTENTION: PAT HARRIS, as per her instructions, it took two days for those papers to go to St. Louis and back to Wellsville; they arrived Thursday, Sept. 7. Thus, the first mailing to Wellsville took seven days, the second mailing of the same edition took two days.

Judging from the phone calls we received from subscribers, Wellsville was not the only problem with our Aug. 30 mailing. A subscriber in Silex, MO, complained that his Aug. 30 newspaper arrived Sept. 6. A subscriber in St. Charles, MO, a St. Louis suburb, complained that her Aug. 30 newspaper arrived Sept. 7, eight days after our papers were delivered to the St. Louis bulk-mail center just a few miles east.

Curiously, on Wednesday, Sept. 6, I received 16 "exchange" newspapers (an unusually high number) in the mail, most of them a week old, but one was a Webster County Citizen from Seymour, MO, dated Aug. 9 and one was a Seneca, MO, News-Dispatch dated Aug. 10. (Exchange newspapers are papers that editors and publishers exchange among themselves; USPS counts them as paid circulation.) My layman's opinion is that the Gateway District cleaned house of backlogged periodicals the night of Sept. 5.

b. Delivery of out-of-state newspapers in a timely manner remains a challenge. For example, on Sept. 6 I received a phone call from a subscriber in Westminster, CO

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80031, who had not received a Vandalia Leader since Aug. 18. She kept me on the phone for 15 minutes and threatened to cancel her subscription and call her relatives in Vandalia to tell them how unsatisfied she was with how we were responding to her complaint, the implication being that she would tell them to cancel their subscriptions, too. Here's another example: On Oct. 2, our receptionist took a phone call from a subscriber in Denton, Texas, who had not received any of our four September issues. "I'm not paying \$40 to not get any papers," she said. We have lost 10 percent of our out-of-area subscribers in the past 18 months (See page 13, lines 10-31, of my testimony). We cannot afford to lose any more.

c. I believe USPS service standards are set too low in certain regions that are served by multiple distribution centers. While a two-day service standard for first-class mail between Vandalia and our county seat of Mexico, 35 miles to our west, may make sense to the USPS because Vandalia and Mexico are served by different distribution centers, it doesn't make sense to the consumer. I shouldn't have to incur additional transportation and labor expense to mail newspapers in Rush Hill, Mo., in order to get them to our county seat the next day. Other Vandalia business people shouldn't have to mail their business mail in Martinsburg, MO, which some do, in order to get it delivered to their county seat the next day. My subscribers in Perry and Center, about 20 miles to my northwest and north, respectively, should not have to wait two days to receive their Vandalia Leader just because that's what the USPS service standard is.

d. I would like to repeat a comment I made Aug. 11 to Jim Hess, acting manager of service performance improvement for the USPS, at the NNA Postal Summit in Washington. In the question-and-answer session, I suggested to Mr. Hess that newspapers need contact people in USPS distribution centers who respond promptly to publisher inquiries about delayed newspapers and who speak in layman's language. I have spent too many hours the past 2 1/2 years trying to get responses from Gateway District personnel when I have delivery concerns. Somebody in the USPS should respond to every publisher concern within 24 hours, by phone or e-mail, even if the response is a simple, "We're not sure what the problem is, but we'll look into it." Also, good customer service includes using words the customer understands. The periodicals tech for the Gateway District tried very earnestly to explain "address service" rules for me over a several-day period in August, but, in a series of e-mails, I never was able to figure out the terms he was using. Finally, I forwarded the e-mail exchange to a paid postal consultant for the Missouri Press Association, and he explained what I needed to do. Again, a lot of hours were wasted unnecessarily because the tech wasn't able to convey his message in language his customer could understand.